



**Solutia Inc.**  
W.G. Krummrich Plant  
500 Monsanto Avenue  
Sauget, Illinois 62206-1198  
Tel 618-271-5835

**December 6, 2002**  
(Via certified or express mail)

Kevin Turner-Environmental Scientist, OSC  
U. S. Environmental Protection Agency  
c/o Crab Orchard National Wildlife Refuge  
8588 Rt. 148  
Marion, IL 62959

Thomas Martin  
Associate Regional Counsel  
77 West Jackson Boulevard (C-14J)  
Chicago, IL 60604-3590

**Re: Sauget Sites Area I - May 31, 2000 Unilateral Administrative Order (UAO)  
Sediment / Soils Removal Action  
# 19 - December 2002 Monthly Report**

Dear Mr. Turner and Mr. Martin,

Enclosed is the December 2002 **Monthly Report** for the Sauget Sites Area I May 31, 2000 Unilateral Administrative Order ("UAO") **Sediment Removal Action**. This submittal is in fulfillment of the monthly reporting requirements of the UAO, Section V, and paragraph 3.4. Reporting.

Sincerely,

A handwritten signature in black ink, appearing to read "Alan G. Faust", is written over the word "Sincerely,".

Alan G. Faust  
Project Coordinator  
Solutia Inc.

cc:

Michael Ribordy - USEPA Region 5  
Sauget File - Solutia  
S. Bron - IEPA  
Mayor D. Reed - Cahokia  
Village of Sauget - c/o P. H. Weis & Associates (Attn: Brian Nelson)  
Linda Tape - Husch & Eppenberger  
Mike Henry - IDNR  
Kevin de la Bruere - USFW  
Mayor P. Sauget - Sauget, IL

**EPA Region 5 Records Ctr.**



**226606**

## **Sauget Sites Area I - Sauget, Illinois**

### **May 31, 2000 UAO – Dead Creek Sediment Removal Action**

#### **Monthly Report**

**Date of Report:** December 6, 2002  
**Period Covered:** November 1, 2002 - November 30, 2002  
**Next Report Period:** December 1, 2002 - December 30, 2002

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#### **Background**

A Unilateral Administrative Order ("UAO") was issued to Solutia by the U. S. EPA on May 31, 2000, requiring construction of **an on-site** containment cell, removal of affected creek bed sediments and soils and **flood plain** soils from specific sections of Dead Creek, and placement of the affected sediments and soils in the newly constructed on-site cell. A Time Critical Removal Action Work Plan ("TCRAWP") was initially submitted to the Agencies on June 30, 2000 for review and approval. Agreements sufficient to proceed with issuance of a request for bids for the containment cell construction were reached in December 2000. Bids were received in **late January** and evaluated in February 2001.

Fieldwork began on the sediment **de-watering** phase of the project in November 2000. Installation of the required facilities (**piping, pumps, basins, etc.**) to de-water the sediments while the containment cell was **being constructed** was completed and started up in February 2001. Operation of these **facilities** will continue until all sediments are placed into the containment cell.

Subject to the inclusion of all **comments and** agreed upon revisions; approval of the containment cell design by U. S. EPA **was received** on March 5, 2001. A contract for construction of the containment **cell was** awarded on March 8, 2001 to LMS Environmental Contracting, Inc. ("LMS"). Placement of fill for the Containment Cell berms began on April 23, 2001. A **March 30, 2001** revised draft containment cell design was approved by the Agencies in a **May 10, 2001** letter. Construction was completed on the Containment Cell on **September 13, 2001**. A draft Containment Cell Certification Report was submitted for the **Agencies'** review and approval upon construction completion. The Containment Cell **was approved** on September 24, 2001 by USEPA and IEPA for receipt of sediment. **Placement** of sediments into the cell began on September 26, 2001.

An Amendment to the UAO was **received on** October 29, 2001. The Amendment modified the project scope of the UAO – **adding** Creek Sector F sediments removal and placement into the Containment Cell. **On August 20, 2001**, Solutia requested a change in

the Post Removal Confirmation Sampling **and** analytical protocols. In a November 30, 2001 communication, the Agency **responded with** revised sampling and analytical protocols.

### **Agency Actions / Communications**

- Revision 01 Draft Groundwater **Monitoring Plan** - submitted to the Agencies on August 3, 2001 – remained under **review**.
- The Operations and Maintenance **Report** - submitted for Agencies' review and approval on August 28, 2001- **remained** under review. Portions of the Plan applicable to the placement of **sediments** have already been approved.
- The revised Mitigation Plan, **submitted** to the Agencies on October 4, 2002, was approved.

### **Work Performed during the reporting period**

- Performed weekly inspection of **the site**.
- Maintained operation of the **50-gpm** stormwater treatment system.
- Inspected and maintained the 6oz. **Geotextile**/6 mil scrim reinforced poly cover over the containment cell.
- Maintained stormwater and **leachate** collection controls around the containment cell.
- Monitored support area facilities.
- A Sampling and Analysis Plan (**SAP**) and a Quality Assurance Project Plan (QAPP) for sampling in the **Borrow Pit Lake** was submitted to the Agencies on November 14, 2002.

### **Data Submittal**

No data are submitted with this report.

### **Work scheduled for next reporting period**

- Conduct routine inspection of **the containment cell**.
- Continue operation of the **50-gpm** stormwater treatment system.
- Perform necessary operation **and** maintenance on the containment cell and temporary treatment system.

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## PROJECT COMPLETION

Mobilization	100 %
Berm Construction	100 %
Liner Installation	100 %
Sediment Removal Preparation	100 %
Sediment Excavation (Site M)	100 %
Sediment Excavation (Original Scope of Work)	100 %
Sediment Excavation (Sector F)	100 %
Temporary Cover installation	100 %
Demobilization - Phase I	100 %
Final Cover Installation	0 %
Demobilization - Phase II	0 %
Final Report Preparation	0 %

### Problems and Solutions

In discussion with officials from the **Village of Cahokia**, standing water in separate segments of Dead Creek emerged as a **source** of concern, given the current public health warnings about the West Nile Virus. **The water** is stagnant because the creek bottom is significantly lower than culvert inverts.

Because of this concern, Solutia **agreed to install** temporary pumps to pump the water downstream. This work was **completed during** the September 1, 2002 – September 30, 2002 reporting period. The permanent **pumping** system was installed last reporting period. The system consists of six **pumps permanently** mounted in the creek. The pumps are fitted with level control switches **and will pump** water downstream through the existing culverts when the water level is **below** the culvert inverts. All work is completed, with the exception of the power **connections**. Illinois Power still has not scheduled a hookup appointment.

### Submittal Schedule Status

See attached UAO schedule

### Issues under review

None

### Comments

None

## **May 31 Sauget Area I UAO Sediment Removal Action**

### **SCHEDULE**

<b>Deliverable</b>	<b>Description</b>	<b>Due Date</b>
Issuance Date	Date UAO signed by Muno	31-May-00
Effective Date	10 business day after issuance	14-Jun-00
Notice of Intent to Comply	3 business days after effective date	19-Jun-00
Designation of Contractor and Project Coordinator	5 business days after effective date	21-Jun-00
Access	14 calendar days after effective date	28-Jun-00
Time Critical Removal Action Work Plan Submittal	15 business days after effective date	7-Jul-00
EPA Approval of TCRA W/P		May 10, 2001
Monthly Reports	Begin 30 calendar days after approval of TCRA W/P until completion	June 10, 2001
Final Report	60 Calendar days after completion of sediments and soils removal	
Mitigation Plan	60 Calendar days after completion of sediments and soils removal	May 22, 2002